

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

v.

(4) AARON DIAZ LIRANZO,
A/K/A “SOSA,”

Defendant.

Case No. 25-cr-10058-NMG

DEFENDANT AARON DIAZ LIRANZO’S SENTENCING MEMORANDUM

Defendant Aaron Diaz Liranzo (“Mr. Diaz Liranzo”) submits this memorandum with respect to the application of 18 U.S.C. § 3553(a) to the facts and circumstances of his offense. For the reasons set forth in the memorandum and to be discussed at the sentencing hearing, Mr. Diaz Liranzo respectfully submits that a sentence of 144 months incarceration, 3 years supervised release, no fine, restitution in the amount of \$8,146, and a mandatory special assessment of \$100 is sufficient but not greater than necessary to achieve the goals of sentencing. *See* 18 U.S.C. § 3553(a).

I. Introduction.

On February 19, 2025, Mr. Diaz Liranzo was arrested on a one count indictment charging him with RICO Conspiracy, in violation of 18 U.S.C. § 1962(d). One month later, Mr. Diaz Liranzo pleaded guilty pursuant to a Rule 11(c)(1)(C) plea agreement. The parties agreed to the following sentence: a term of incarceration between 144 and 168 months, no fine, 3 years

supervised release, restitution in the amount of \$8,146, and a mandatory special assessment of \$100.

Almost immediately after his arrest, Mr. Diaz Liranzo informed the government, through his counsel, that he wanted to accept responsibility and plead guilty. He understood the seriousness of the charges and that he would face a substantial term of incarceration. But Mr. Diaz Liranzo views this case as an opportunity to make amends for his past conduct and change his life. With the support of his family and friends, evidenced by the thoughtful letters of support attached to this memorandum (*see* Exhibits 1 through 6 attached hereto),¹ Mr. Diaz Liranzo is determined to repay his family and friends for their unwavering support by becoming the person he is capable of being.

II. The Parties’ Requested Sentence is Sufficient but not Greater than Necessary to Achieve the Goals of 18 U.S.C. § 3553(a).

1. The History and Characteristics of the Defendant and the Nature and Circumstances of the Offense.

A. The History and Characteristics of the Defendant.

Mr. Diaz Liranzo is only 26 years old. Presentence Investigation Report (“PSR”) ¶ 156. He was born in Santo Domingo, Dominican Republic to his father, Huascar Diaz, and his mother, Maria Liranzo De Diaz. *Id.* He has four siblings: a sister, Walkiria Diaz Liranzo; an older brother, Josué Diaz Liranzo; a younger brother, Evans Diaz Liranzo; and a half-brother, Miguel David Liranzo. *Id.* During his early childhood years, Mr. Diaz Liranzo was raised by his mother in the Dominican Republic. *Id.* ¶ 157. At the time, Mr. Diaz Liranzo’s father, a United States citizen, resided in the United States and took care of Mr. Diaz Liranzo’s grandmother. *Id.*

¹ To avoid including personally identifiable information on the public docket, redacted versions of the letter of support have been filed with this memorandum. Unredacted versions of the letters of support have been provided to the United States Probation Office and counsel for the government.

While in the Dominican Republic, Mr. Diaz Liranzo lived in an apartment with his mother and his siblings. *Id.* His mother worked at a supermarket to help support the family in the absence of her husband. *Id.* Despite the distance, his parents remained married and always had a good relationship. *Id.* ¶ 158.

Although his father was not physically present in his life during his early childhood, Mr. Diaz Liranzo remained close with him. They spoke daily on the telephone. *Id.* ¶ 157. At age 9, Mr. Diaz Liranzo immigrated to the United States with his sister, Walkiria, and his brothers, Josué and Evans, to live with their father and grandmother in public housing in Lynn.² *Id.* Even with their father working various jobs, the family still struggled financially. *Id.* Despite their financial struggles, the family remained close and looked after one another. Unfortunately, Mr. Diaz Liranzo's mother did not join the rest of the family until five years later. *Id.* Although Mr. Diaz Liranzo struggled with being away from his mother during those five years, he remained close to her and spoke with her daily. *Id.*

Mr. Diaz Liranzo's sister, Walkiria, played a prominent role in his upbringing. In an effort to help their mother, Walkiria often cared for Mr. Diaz Liranzo. *See* Ex. 1 (Letter of Support of Walkiria Diaz Liranzo). As a result, she views Mr. Diaz Liranzo "more like a son . . . than a brother." *Id.* Mr. Diaz Liranzo even refers to Walkiria as his "second mom." *Id.*

Despite the support of his parents, grandmother, and siblings, Mr. Diaz Liranzo was immature, got into trouble, and struggled in school. PSR ¶ 170. Fortunately though, Mr. Diaz Liranzo still was able to graduate from the welding program at Lynn Vocational Technical High School. *Id.*

² Mr. Diaz Liranzo is a naturalized United States citizen. PSR ¶ 157.

As a teenager, Mr. Diaz Liranzo began experimenting with controlled substances. At the age of 17, he first used marijuana. *Id.* ¶ 169. Mr. Diaz Liranzo smoked marijuana approximately three times per week prior to his arrest. *Id.* At age 18, Mr. Diaz Liranzo began using alcohol. *Id.* However, he did not like it. *Id.* Accordingly, as an alternative to alcohol, Mr. Diaz Liranzo turned to “Lean,” an illicit substance also known as “Purple Drank,” that is popular among teens and young adults because of its sweet taste and its prevalence in popular culture. *Id.* See also <https://www.addictioncenter.com/opiates/codeine/lean-addiction-abuse/> (description of “Lean”). Lean is a “recreational drug” often times prepared by mixing codeine with a soft drink or hard candy. See *id.* Its effects are similar to other addictive opioids like oxycodone, heroin, and fentanyl. *Id.* Unfortunately, Lean is a highly addictive substance that can cause a number of health problems. *Id.* Those health problems include seizures, hallucinations, a slowed heart rate and breathing, and even death. *Id.* Mr. Diaz Liranzo abused Lean approximately twice per week leading up to his arrest.

Despite his current incarceration, Mr. Diaz Liranzo remains very close with his family. Although his family is heartbroken about the situation, they remain “super supportive” of him. PSR ¶ 160. Mr. Diaz Liranzo remains in consistent contact with his family, including his one-year-old daughter, and her mother, Paola Sanchez. *Id.* ¶ 161. Paola has expressed appreciation for Mr. Diaz Liranzo’s devotion to their daughter, and the bond he has created with her. See Ex. 2 (Letter of Support of Paola Sanchez). Despite Mr. Diaz Liranzo’s incarceration, he still speaks with his daughter on a daily basis. PSR ¶ 161. While he is unable to be physically present, Mr. Diaz Liranzo has expressed a sincere commitment to remain a part of his daughter’s life. Ex. 2.

B. The Nature and Circumstances of the Offense

On February 13, 2025, Mr. Diaz Liranzo was indicted on one-count of RICO Conspiracy, in violation of 18 U.S.C. § 1962(d). PSR ¶ 9. The indictment stems from Mr. Diaz Liranzo’s role as a member of the Lynn Chapter of the Massachusetts Trinitarios gang (the “Trinitarios”), and his participation in a number of racketeering acts in support of the Trinitarios. *Id.* ¶ 38. Most notably, Mr. Diaz Liranzo participated in a March 16, 2019 shooting of three rival gang members at the Conga Lounge in Lynn. *Id.* ¶¶ 43-48. Mr. Diaz Liranzo also participated in: thefts of delivery packages containing iPhones and other Apple products; the unarmed robbery of a FedEx driver; a lottery ticket theft scheme; the sale of two firearms; and the sale of approximately 100 grams of fentanyl.³ *Id.* ¶¶ 78-86.

2. Just Punishment and Deterrence.

A sentence of 144 months incarceration, 3 years of supervised release, no fine, restitution in the amount of \$8,146, and a mandatory special assessment of \$100, is a significant sentence that will “reflect the seriousness of the offense,” “promote respect for the law,” “provide just punishment for [Mr. Diaz Liranzo’s] offense,” “afford adequate deterrence to criminal conduct,” and will “adequately protect the public” from any future crimes of Mr. Diaz Liranzo. *See* 18 U.S.C. § 3553(a).

Mr. Diaz Liranzo is only 26 years old. PSR ¶ 156. The requested term of incarceration of 144 months is a significant punishment, far greater than any criminal punishment Mr. Diaz Liranzo has received to date. *See id.* ¶¶ 145-54. Yet, this punishment will not define Mr. Diaz Liranzo’s life. With the requested term of 144 months incarceration, Mr. Diaz Liranzo will have

³ On April 24, 2024, following an investigation into the lottery ticket theft scheme, the Massachusetts State Police executed a search warrant at Mr. Diaz Liranzo’s residence. PSR ¶ 69. The Massachusetts State Police recovered approximately 17.76 grams of fentanyl from his bedroom. *Id.*

significant time to obtain much-needed vocational training while in BOP custody.⁴ *See* 18 U.S.C. § 3553(a). However, he will still be scheduled for release from custody prior to the age of 40. Hopefully by then, assuming Mr. Diaz Liranzo follows through with his promise to obtain additional vocational training while incarcerated, he will be in a position to put his past life behind him and succeed in life after release from custody.

3. The Kinds of Sentences Available and the Sentencing Guidelines.

Mr. Diaz Liranzo has pleaded guilty to one count of RICO Conspiracy, in violation of 18 U.S.C. § 1962(d). PSR ¶¶ 1-4. The United States Sentencing Guidelines (“USSG”) calculate Mr. Diaz Liranzo’s Total Offense Level based on the Offense Levels for the underlying racketeering activities that gave rise to the 18 U.S.C. § 1962(d) charge. *See* USSG 2E1.1(a)(2).

Mr. Diaz Liranzo’s Total Offense Level is 39. *Id.* ¶ 142. Although Mr. Diaz Liranzo is involved in eight racketeering activities, his Offense Level is based primarily on the three acts of attempted murder related to the Conga Lounge shooting on March 16, 2019. *Id.* ¶¶ 95, 98-116, 142. The Offense Levels for the other five racketeering activities are too low. *Id.* ¶¶ 117-35. Thus, they do not factor into Mr. Diaz Liranzo’s Total Offense Level. *Id.* ¶¶ 135-38.

Based on Mr. Diaz Liranzo’s criminal history, he falls within Criminal History Category I. *Id.* ¶¶ 145-54. With a Total Offense Level of 39 and a Criminal History Category of I, the sentencing guidelines recommend sentencing Mr. Diaz Liranzo to a term of incarceration of 262-327 months. *See* USSG § 5A (Sentencing Table). However, such sentence is above the statutory maximum sentence of 20 years incarceration. *See* 18 U.S.C. § 1963(a).

⁴ Although Mr. Diaz Liranzo graduated from the welding program at Lynn Vocational Technical High School in 2017, he has had no other formal education and no other specialized training or professional licenses. PSR ¶ 170-72. Mr. Diaz Liranzo has expressed an interest in obtaining vocational training while in BOP custody.

4. Grounds for a Sentence Below the Guidelines.

A sentence of 144 months incarceration, 3 years of supervised release, no fine, restitution in the amount of \$8,146, and a mandatory special assessment of \$100, though it is below the sentence recommended by the sentencing guidelines, is sufficient but not greater than necessary to achieve the varied goals of 18 U.S.C. § 3553(a). As this Court is well-aware, the guidelines are “merely advisory, which means that a district court has considerable leeway to impose a sentence that falls outside the range suggested.” *United States v. Robinson*, 433 F.3d 31, 35 (1st Cir. 2005). A sentence that is below the sentence recommended by the guidelines, and is at the low end of the parties’ agreed-upon sentence, is appropriate in these circumstances because of Mr. Diaz Liranzo’s personal characteristics and his swift acceptance of responsibility.

Mr. Diaz Liranzo is best described by those who know him so well, his family. In the words of his older brother Josué, Mr. Diaz Liranzo is a “truly special young man—charismatic, kind, and genuinely warm hearted.” Ex. 3 (Letter of Support of Josué Diaz Liranzo). According to his sister Walkiria, Mr. Diaz Liranzo is “a beautiful soul.” Ex. 1. But, even his family members recognize he is not perfect. *See* Ex. 4 (Letter of Support of Evans Diaz Liranzo). Mr. Diaz Liranzo has made many poor decisions in his life, his most notable being his involvement in the instant offense. But at his core, Mr. Diaz Liranzo is a good person who is “capable of reflection, growth, and redemption.” *Id.*

Family is at the “center” of Mr. Diaz Liranzo’s heart. *Id.* Mr. Diaz Liranzo takes pride in supporting his family, whether that support be emotional support, by acting as a protective sibling (*see* Ex. 1), or financial support, by giving away a portion of his paycheck to his parents in an effort to help out. *See* Ex. 3. Mr. Diaz Liranzo has always been the type of person who would “readily give the very shoes on his feet” to support those around him. *Id.* He is there for others in

times of seriousness, to give advice when needed. *See* Ex. 5 (Letter of Support of Anula Papajani). He is also there in times of levity, to lend a smile or a laugh. *See* Ex 3; Ex 4.

Perhaps most importantly though, Mr. Diaz Liranzo remains a supportive and loving father in the life of his one-year old daughter. While Mr. Diaz Liranzo's incarceration will prevent him from being physically present for a large portion of his daughter's childhood, he has vowed to continue to build an emotional bond with his daughter, as evidenced by the nightly bedtime phone calls with her to learn about her day. *See* Ex. 2.

Put simply, this case has been a wake-up call for Mr. Diaz Liranzo. If the Court accepts the parties' Rule 11(c)(1)(C) plea agreement, the Court could impose a term of incarceration of between 144 months and 168 months. This penalty is far greater than any of the potential penalties Mr. Diaz Liranzo has faced in any prior criminal proceeding. Mr. Diaz Liranzo regrettably understands that any term of incarceration imposed by the Court will have significant negative impacts on Mr. Diaz Liranzo's parents, siblings, and young daughter. With that in mind, he quickly pleaded guilty in an effort to accept responsibility for his actions. Mr. Diaz Liranzo acknowledges and regrets his shortcomings and wrongdoings. *See* Ex. 6 (Letter of Support of Maria Liranzo De Diaz).⁵ He wants to begin the path towards becoming a positive influence in society. But above all, he wants to minimize the negative impact his absence will have on those that he loves, particularly his young daughter.

⁵ This letter of support was originally written in Spanish. Undersigned counsel received a translated version of the letter from Mr. Diaz Liranzo's sister, Walkiria Diaz Liranzo. Both the original and translated versions of the letter are attached hereto as Ex. 6.

III. Conclusion

For the reasons explained above, Mr. Diaz Liranzo respectfully requests that the Court impose a sentence of 144 months incarceration, 3 years supervised release, no fine, restitution in the amount of \$8,146, and a mandatory special assessment of \$100.

Respectfully submitted,

/s/ George W. Vien
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Dated: June 20, 2025

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), on June 20, 2025.

/s/ Pietro A. Conte
Pietro A. Conte